



SDMS DocID

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Pennsylvania Department of Environmental Protection

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Southcentral Regional Office

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Mr. Mitch Cron (3HS43)
Remedial Project Manager
US EP Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Cron:

The Department has reviewed the Proposed Remedial Action Plan (PRAP) for preferred remedial alternative to address the 1,4-dioxane present in the Bally public water system. The draft Superfund PRAP indicates that the preferred option is Alternative 1 - Installation of a New Municipal Supply Well. The Department also believes this represents the best option.

The Department has the following comments:

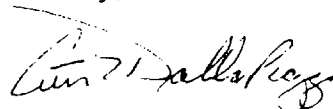
1. A permit from the Department's Water Supply Management Program to operate the new public water supply well is an applicable regulatory requirement. Monitoring of 1,4-dioxane as well as other substances in the raw well water and distributed supply will be conducted in accordance with permit requirement. The ground water monitoring plan proposed in the remedial action plan will not replace these requirements.
2. The Department has not received a PWS permit application for the proposed replacement municipal supply well (as described under Alternative 1). Our expectation is that the well will be properly drilled, constructed and tested in accordance with Department regulations and standards. Ideally, the goal is to develop a new well that will not exceed any of the Department's MCLs or SMCLs.
3. With regard to Alternative 2 - Additional Treatment of current Well MW #3, Page 13 under "Short-Term Effectiveness" indicates that implementation of Alternative 2 would take three to six months. This short timeframe is highly unlikely given the fact that extensive pilot testing would be required (see Page 12 under "Long-Term Effectiveness") and the fact that this system would also be subject to PWS permitting requirements in accordance with 25 PA Code, Chapter 109 of the SDWA regulations. A more realistic timeframe would be 12 to 18 months.
4. At least seven references are made to a 6 ppb limit for 1,4-dioxane: Page 4, Page 8, Page 9 (two references), Page 13, Page 14 and Page 15. The September 30, 2003, EPA Administrative Order on Consent under the Safe Drinking Water Act, stated for the purposes of the Order consumption of drinking water over a 70-year period containing 3 parts per billion or greater of 1,4-dioxane may present an imminent and substantial

endangerment to the health of persons. The Focused Feasibility Study also contains the 3 parts per billion or greater of 1,4-dioxane level.

5. To determine protective levels in a permitted public water supply for substances classified as probable human carcinogens action levels are set at 1×10^{-6} with consumption over a 70-year period. This results in an action level of 3 parts per billion or greater for 1,4-dioxane. The permittee will be required to implement actions when the distributed supply exhibits contaminant concentrations in excess of 3 parts per billion or greater for 1,4-dioxane.
6. The public water supply for the Borough of Bally has shown contamination with VOCs since 1982, although 1,4-dioxane was not determined to be present until more recent analytical procedures. Persons utilizing the public water supply may have already had prolonged exposure. An action level for 1-4-dioxane of 3 parts per billion or greater should be established to be protective of public health.

Thank you for the opportunity to comment. If you have any questions, please call me at (717) 705-4861.

Sincerely,



Arthur Dalla Piazza, Chief
Hazardous Sites Cleanup Section
Environmental Cleanup Program

cc: Linda Dietz, US EPA, 3HS22
Craig Olewiler, DEP
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